

# Federal Defenders OF NEW YORK, INC.

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August 25, 2022

BY ECF & EMAIL

Honorable Judge Paul E. Davison  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: United States v. Juan Morel  
22 MJ. 5102 (UA)

USDC SDNY  
DOCUMENT  
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Dear Judge Davison:

I write on behalf of my client, Juan Morel, to respectfully seek a temporary modification to Mr. Morel's bail conditions to allow him to travel between his home in New Rochelle, New York and Tenafly, New Jersey from September 7, 2022 to September 21, 2022. Mr. Morel works installing skylights, and his employer has a job in Tenafly on those dates. If approved, Mr. Morel would leave his home each morning to reach the job site by 6:00am and depart the job site by 6:00pm to return back home.

Respectfully submitted,

/s/ Mark B. Gombiner  
Mark B. Gombiner, Esq.  
Assistant Federal Defender  
Tel.: (212) 417-8718

**APPLICATION GRANTED**

Hon. Paul E. Davison, U.S.M.J.

cc: AUSA Kingdar Prussien (by ECF)  
Leo Barrios, Pretrial Services Officer (by E-mail)